



June 30, 2020

VIA ECF and Electronic Mail

Hon. Victor Marrero
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Randy Torres, et. al.
16 CR 809 (VM)

Dear Judge Marrero,

As the Court is aware, Mr. Schmidt and I represent Mr. Torres in the above referenced matter. Mr. Torres and his trial co-defendants are set to be sentenced on September 25, 2020. On June 18, 2020 we received Mr. Torres' Pre-Sentencing Report ("PSR") from Probation. Earlier last week, we mailed Mr. Torres, who is currently being housed in the Metropolitan Correctional Center ("MCC"), a copy of his PSR for his review. On June 29, 2020, Mr. Torres and I had a legal call in order to go over his PSR and prepare for our first objections, currently due on July 2, 2020. During the June 29th legal call, Mr. Torres informed me that he had not yet received a copy of his PSR, due to delays in receiving legal mail at MCC; therefore, the call was not as constructive as it needed to be in order to properly prepare for our objections.

We now ask the Court for an extension of 2 weeks (14 days) for the defense to file its objections to the first PSR disclosure and for Probation to file its final PSR for Mr. Torres. We do not seek an extension of the sentencing date or for the parties sentencing submissions. The Government does not object to this request.

If the Court has any questions, please do not hesitate to call my office or contact me via email.

Thank you.



Respectfully submitted,

A handwritten signature in black ink, appearing to read 'AL BT', is positioned above a horizontal line.

Attorney for Defendant Randy Torres

Andrew M. J. Bernstein, Esq.

Partner

SICHENZIA ROSS FERENCE LLP

Sam A. Schmidt, Esq.

THE LAW OFFICE OF SAM A.
SCHMIDT